

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

STEPHANIE LYNN FORD)
)
)
 PLAINTIFF,) CIVIL ACTION NO. 06-301 (***)
) JURY TRAIL
)
 V.)
)
)
 CHRISTIANA CARE HEALTH)
 SYSTEMS, RICHARD BURTON, AND)
 CLARA CLARK)
)
)
 Defendants.)

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PLAINTIFF'S CASE DISPOSITIVE MOTION, OPENING BRIEF AND AFFIDAVIT Against The
Defendants, Christiana Care Health Systems , Richard Burton and Clara Clark.

1. Plaintiff, STEPHANIE LYNN FORD, resides at 19 Albany Ave. Newcastle, Delaware 19720.
2. Defendants, CHRISTIANA CARE HEALTH SYSTEMS, RICHARD BURTON, AND CLARA CLARK, / ATTORNEYS FOR DEFENDANTS, DAVID H. WILLIAMS (#616) , JAMES H. McMACKIN (# 4284), MORRIS JAMES LLP., 500 Delaware Avenue, Suite 1500 P.O. Box 2306 Wilmington, Delaware 19899, MICHAEL J. OSSIP, THOMAS S. BLOOM, MORGAN, LEWIS & BOCKIUS LLP 1701 Market Street Philadelphia, PA 19103.

OPENING BRIEF:

I the plaintiff, Stephanie Lynn Ford have a actionable claim against the defendants Christiana Care Health Systems, Richard Burton, and Clara Clark for Race Discrimination and Terminating Job Employment, Benefits, and Pension Benefits.

1. Violation of Civil Rights Act Of 1991 Title 1
2. Violation of Title V of The Americans with Disabilities Act (ADA)
3. Title VII of The Civil Rights Act of 1994,
4. Race Discrimination
5. Employment Discrimination

(1)

9 pages

6. Violation of The Family Medical Leave Act of 1993, (FMLA)
7. Violation of The ERISA Act,
8. 29 U.S.C. 1132.
9. Wrongful Termination of Plaintiff's Pension Benefits.
10. Wrongful Termination of Plaintiff's Retiree Pension Benefits.
11. Wrongful Termination of Plaintiff's \$75,000 Life Insurance Policy.
12. Wrongful Termination of Plaintiff's Health Insurance Benefits.

I the plaintiff, Stephanie Lynn Ford have been working at Christiana Care Health Systems for 17 years from August 24, 1987 To October 28, 2003, I was involved in a Hit & Run Automobile Accident on October 28, 2003 my injuries are CERVICAL THORACIC LUMBOSACRAL STRAIN, S/P R SIDED RIB TRAUMA, BILATERAL HAMSTRING STRAIN, R SHOULDER ARM, FOREARM STRAIN, R UPPER QUADRANT, R FLANK. TREATING PHYSICIANS, Wilmington Pain & Rehabilitation Center, Dr. Ross M. Ufberg M.D. 1021 Gilpin Avenue Suite 101 Wilmington, Delaware 19806, St. Francis Hospital 7th Clayton Street Wilmington, Delaware 19805

I the plaintiff, Stephanie Lynn Ford am raising the issue of the unlawful misconduct against the Defendant, Christiana Care Health Systems for wrongfully terminating plaintiff's employment. The defendant refuse to placed the plaintiff in a job position ,on April 13,2004 the defendant terminated plaintiff's pension benefits, without any due process of the law, I have enclosed a copy of the Pension Information Form D0197.

Christiana Care Health Systems is in violation of the Civil Rights Act of 1991 Title I , In violation of Title V of the Americans with Disabilities Act (ADA), In violation of Title VII of the Civil Rights Act of 1994, In violation of Race Discrimination, In violation of Employment Discrimination, In violation of the Family Medical Leave Act of 1993 (FMLA) , In violation of the ERISA ACT, In violation 29 U.S.C. 1132, Wrongful Termination of Plaintiff's Pension Benefits, Wrongful Termination of Plaintiff's Retiree Pension Benefits, Wrongful Termination of plaintiff's \$ 75,000 Life Insurance Policy, Wrongful Termination of Plaintiff's Health Insurance Benefits.

I the Plaintiff, Stephanie Lynn Ford am raising the issue of the unlawful misconduct against the



defendant, Richard Burton / Job Recruiter wrongfully without any due process of the law told the plaintiff, Stephanie Lynn Ford quote " FIND OTHER EMPLOYMENT AT ANOTHER CORPORATION" end quote. The defendant Richard Burton refused to placed the plaintiff in a position equal to my pay or any other position that were available. After, I the plaintiff , Stephanie Lynn Ford have applied for 29 jobs positions at the Christiana Care Health Systems including the job I had previously worked for 9 years in the Medical Records Department at Christiana Care., Richard Burton is in violation of the Civil Rights Act of 1991 Title I, In violation of Title V of the Americans with Disabilities Act (ADA) , In violation of Title VII of The Civil Rights Act of 1994, In violation of Race Discrimination, In violation of Employment Discrimination , In violation of The Family Medical Leave Act of 1993 (FMLA) , In violation of the ERISA ACT , In violation of 29 U.S.C. 1132, Wrongful Termination of Plaintiff's Pension Benefits, Wrongful Termination of Plaintiff's Retiree Pension Benefits , Wrongful Termination of Plaintiff's \$ 75,000 Life Insurance Policy , Wrongful Termination of Plaintiff's Health Insurance Benefits.

I the Plaintiff , Stephanie Lynn Ford am raising the issue of unlawful misconduct against the Defendant Clara Clark for wrongfully refusing the plaintiff employment in the Medical Records Department, the position I had previously worked in prior for 9 years at Christiana Care Health Systems. The Defendant Clara Clark is in violation of Civil Rights Act of 1991 Title I , In violation of Title V of the Americans with Disabilities Act (ADA) , In violation of the Title VII of the Civil Rights Act of 1994, In violation of Race Discrimination, In violation of Employment Discrimination , In violation of the Family Medical Leave Act of 1993 (FMLA) , In violation of the ERISA ACT , In violation of the 29 U.S.C. 1132 , Wrongful Termination of Plaintiff's Pension Benefits , Wrongful Termination of Plaintiff's Retiree Pension Benefits , Wrongful Termination of Plaintiff's \$ 75,000 Life Insurance Policy , Wrongful Termination of Plaintiff's Health Insurance Benefits.

RELIEF: WHEREFORE, Plaintiff Stephanie Lynn Ford ask this Honorable Court to grant plaintiff's motion.

The Plaintiff Stephanie Lynn Ford am requesting this Honorable Court to grant monetary damages in the amount of \$100,000 dollars for Pain and Suffering , Pension Reinstated , Retiree Pension Plan Reinstated , \$ 75,000 Life Insurance Policy Reinstated , Loss Wages With Interest , Plus Court Cost And Attorney Fees.

SINCERELY,

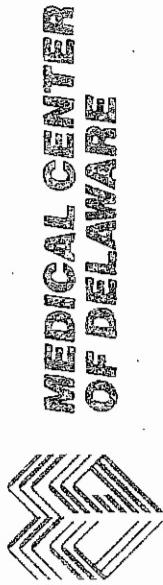
Stephanie Ford 1/29/07

STEPHANIE LYNN FORD
19 ALBANY AVE.
NEWCASTLE, DELAWARE 19720

(4)

EXHIBIT A

CARING
EXCELLENCE
CERTIFICATE OF APPRECIATION



INTEGRITY

LEADERSHIP

PRIDE

TEAMWORK

(7)

Presented to

STEPHANIE FORD

In Recognition of

TEN YEARS

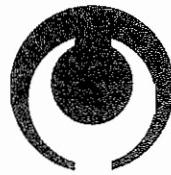
of Dedicated and Loyal Service

Charles W. Sweet Jr.
President

August, 1997

CARING
EXCELLENCE
INTEGRITY

CERTIFICATE OF APPRECIATION



CHRISTIANA CARE

LEADERSHIP
PRIDE
TEAMWORK

Presented to

STEPHANIE FORD

In Recognition of

FIFTEEN YEARS

of Dedicated and Loyal Service

Charles W. Swope, M.A.
President

August, 2002

CERTIFICATE OF SERVICE

THE UNDERSIGNED HEREBY CERTIFIES

THAT COPIES OF THE FOREGOING

WERE CAUSED TO BE SERVED THIS

29th Day January 2007 UPON THE

FOLLOWING IN THE MANNER INDICATED:

U.S. Certified Mail

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